UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MA 02114-2023

Memorandum

To: File

Date: July 2, 2007

Subject: Meeting Notes
ExxonMobil Everett Terminal July 2, 2007
NPDES Permit MA0000833

From: Ellen Weitzler

This is to document a meeting held at the ExxonMobil (EM) Everett Terminal regarding the draft NPDES permit that was issued for that facility. The meeting was hosted by ExxonMobil at the Everett Terminal. David Webster, Ellen Weitzler and Ann Williams attended from EPA. Paul Hogan attended from MassDEP. Other attendees included Dianne Phillips (Holland & Knight, outside counsel), John Thompson, LSP (Woodard and Curran), Sandra Perry (Triumviratesupport), Tom Budde (EM), Gary Morris (EM), Arthur Powers (Terminal Supervisor, EM), and David McWilliams (EM).

EPA opened the visit with a statement to clarify that the meeting was being held during the draft permit public notice period. Although EPA would be able to answer technical questions and clarify ambiguities related to the draft permit or fact sheet, EPA could not commit to any permit changes until all comments had been received and after the public comment period ends on July 16th. EPA recommended that any substantive comments that may result in permit revision be submitted in writing before the end of the comment period. EPA also informed the attendees that EPA would document the meeting in a trip report to be included in the permit file.

The meeting started with a 2-hour site tour at about 10 AM. The tour included the tank farm, the treatment works, and both the upstream and downstream ends of the 1500 ft culvert which carries outfall 001 discharge from the terminal to the Island End River.

In general, EPA's observations at the terminal were similar to those observed during EPA's March 23, 2006. However, EPA had not inspected the 1500 ft culvert during the previous site visit. The cross section of the culvert is rectangular in shape on the ExxonMobil property. According to ExxonMobil personnel, the box culvert is the original discharge structure. The circular sections (most of the 1500 ft length) were added on when the upstream section of the Island End River was filled in sometime during the early 20th century. During the site visit, an oily sheen and odor was observed at the upstream culvert access structure. According to Tom

Budde, this was the result of downstream (non ExxonMobil) sources of petroleum products that have been pushed up the culvert with incoming tides. The downstream end of the culvert (at the Island End River) was submerged. No oily sheen or odor was observed in the Island End River. ExxonMobil personnel stated that there are known illegal connections onto the culvert between ExxonMobil and the Island End River. These were documented in 1985 and 1986 culvert inspection reports. (EPA has received the 1985 report, but not the 1986 report which ExxonMobil agreed to send to Ellen Weitzler)

Following the site visit, the meeting attendees convened in a conference room to discuss the details of the permit. The following summarizes the highlights of that discussion:

- ExxonMobil's goal is to protect the Island End River and to ensure that their discharge does not cause a violation of water quality standards.
- ExxonMobil recognizes that there is significant work that they need to do, but is finding it a design challenge to meet the end of pipe effluent standards.
- ExxonMobil is looking into the discharge location for the maintenance garage floor drains to confirm that they currently discharge to the storm water system.
- Currently tank bottoms are pretreated in batch on site and discharged to the MWRA sewer.
- There are currently two passive oil recovery wells operating on site.
- ExxonMobil stated that the treatment capacity is 500 gpm for the separation flume and 4,000 gpm for the oil water separator. This is greater than the 3,000 gpm oil water separator design flow reported earlier by ExxonMobil.
- Caked oil in the treatment works (noted on the tops of baffle walls during the site tour) is due to past operations in the late 1980s.
- MassDEP is currently auditing the MCP cleanup activities at the ExxonMobil facility and has indicated that ExxonMobil will be required to eliminate/control all source areas of groundwater contamination by October 2009.
- ExxonMobil asked EPA to recommend or approve of technologies or cleanup approaches that would eliminate "contaminated groundwater" (as described in the fact sheet) and the need for groundwater treatment technology based effluent limits for benzene and MTBE. EPA explained that cleanup approaches could not be approved or disapproved under the NDPES program. However, effluent limits could be reevaluated in the next permit cycle. The intention of the explanations in the fact sheet were to make clear that if the contaminated groundwater was clearly no longer discharging into the storm drains, the effluent limits could be revised in the future to be based only on storm water discharged. The presence of polycyclic aromatic hydrocarbons (PAHs) in the effluent may be one indicator of contaminated groundwater in the discharge as these contaminants are not routinely detected in storm water at bulk petroleum storage facilities in the region.
- EPA recommended that ExxonMobil focus on separating the contaminated groundwater from the storm water discharges as a potentially feasible option for meeting the permit limits. This could involve such technologies as inspecting and

reparing storm drains or pumping and treating groundwater in contamination source areas. EPA also suggested that this may result in an iterative approach to meeting the effluent limits.

- ExxonMobil expressed concern that MTBE was included as a newly limited permit parameter. EPA explained that although only one discharge sample was analyzed for MTBE (with elevated levels detected), historical monitoring well sample analyses indicate elevated concentrations of MTBE in numerous wells. EPA recommended that ExxonMobil include this concern in a written comment to be considered after the public comment period has ended.
- ExxonMobil also questioned the oil and grease limit of 5 mg/l. EPA acknowledged that total petroleum hydrocarbons is the typical parameter measured in contaminated groundwater rather than oil and grease. However, given the analytical similarities and the presence of oil and grease as a permit parameter in the ExxonMobil's current and previous permits, EPA had chosen to include oil and grease in the draft permit. Again, EPA recommended that ExxonMobil include this concern in a written comment to be considered after the public comment period has ended.
- ExxonMobil expressed concern about one of the PAH method detection limits cited in the permit. EPA recommended that ExxonMobil include this concern in a written comment to be considered after the public comment period has ended.
- ExxonMobil expressed concern that the permit prohibition against bypasses if the treatment works and collection system is sized to handle a 10 year storm is confusing. EPA agreed that it needs clarification and recommended EPA include that as a written comment. EPA clarified that the requirement is intended as an alternative to a flow limit which may be difficult to implement and enforce, given the nature of storm events. ExxonMobil said that the existing system was designed to accommodate a 10 year storm. EPA said that the permit could be revised to include the certifications that would be required associated with this provision.
- EPA explained that because the new effluent limits are technology based, the regulations do not allow EPA to include a compliance schedule in the permit. However, EPA commonly uses the administrative order process to allow permittees time to implement the structural and management changes called for in the permit.
- Dianne Phillips requested that EPA send an example of an administrative order. EPA agreed to send her one.
- ExxonMobil requested a copy of any public comments received when they come in.

The meeting concluded at about 2:45 PM.